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May 23, 2022

**VIA ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square Room 2103  
New York, New York 10007

**MEMO ENDORSED**

Re: *J.C. v. Zimmerman*  
22-cv-323-KPF (S.D.N.Y.)

Dear Judge Polk Failla:

I represent the Plaintiff J.C. in this action. I write in response to the May 16, 2022, letter of Andrea Schillaci, Esq. requesting an order directing that we comply with outstanding discovery.

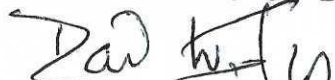
As an initial matter I apologize to the Court and Ms. Schillaci for not timely providing responses to Defendant's First Set of Interrogatories and First Request for Production of documents. Ms. Schillaci is correct that I had promised to provide responses but failed to do so.

My failure was not intentional but an amalgamation of several matters, including the filing of a complaint in this Court, preparing for two medical malpractice trials scheduled next month and, a trip to Ghana West Africa. I will note however that I did provide Ms. Schillaci with HIPPA authorizations for my client's records.

I represent to the Court and Ms. Schillaci that I shall serve Plaintiff's responses a week from today. My apologies again for any inconvenience to the Court and Defendant's counsel.

Respectfully submitted,

LAW OFFICES OF DANIEL W. ISAACS, PLLC

  
DANIEL W. ISAACS

The Court is in receipt of Defendant's May 16, 2022 letter and Plaintiff's above responsive letter. Plaintiff shall serve her responses on or before **May 30, 2022**. More broadly, Plaintiff is cautioned that future failures to meet the discovery deadlines set forth in the parties' case management plan or this Court's rules of individual practice will not be tolerated.

The Clerk of Court is directed to terminate the motions at docket entires 25 and 26.

Dated: May 24, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE